

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
DIVISION

FILED

JUL - 7 2006

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

George Poole

(Enter above the full name of the Plaintiff[s]
in this action.)

- vs -

Terry Bales

Jason Flanery

City of Webster Groves

Debra Lemoine

(Enter above the full name of ALL Defendant[s] in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of all the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

06CV01032TCM

Case No.

(To be assigned by Clerk
of District Court)

COMPLAINT

- I. State the grounds for filing this case in Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

First Amendment and Conspiracy
to violate first amendment

II. Plaintiff, George Poole resides at
P.O. Box 775153, St. Louis
street address city county
MO, 63177, 255-3500
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

III. Defendant, Terry Bales lives at, or its business is located at
4 East Lockwood, Webster Groves
street address city county
Missouri, 63119
state zip code

(if more than one defendant, provide the same information for each defendant below)

Jason Flavery - Same as above
Debra Lemoine - Same as above
City of Webster Groves - Same as above

- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

This is a case of Defendants violating clearly established statutory and plaintiff's constitutional rights. Abridging the freedom of speech, the right to petition the government for a redress of his grievances, thus plaintiff's Liberty without Due Process of Law. A Lesson from the pages of history should be helpful. On or about 9-5-04 Defendant Flanery wrote plaintiff several traffic tickets. Plaintiff filed suit base on racial profiling, plaintiff did not appear in court (Webster Gurnes) on the citation written by defendant Flanery, Plaintiff had an attorney entry his appearance, see exhibits 2A, 23, 24, 25, and attorney front file exhibit 29.

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Numerous of Court dates, Plaintiff was never in forms when to appear in Court by his attorney nor Webster Groves.

While the Case in Federal Court was pending against defendant Flanery, the district Court Judge Limbaugh granted summary judgment.

Plaintiff appeal, the Court of Appeals Remand on 1-11-06, the district court ordered a scheduling order (case # 4:04-cv-00940-SNL) Trial set for 10-30-06. NO Wanted was place on plaintiff during the period of 2-04 thru 2006 June 4.

Plaintiff ask a Court friend to run him and learn Defendants had put back in the computer three Wanted's on him, see exhibit-1A.

Defendant Bates is not shield because she knew of numerous of Court dates.

Defendant Lemoine is not shield because she made the recommendations on plaintiff's tickets see exhibit's 26, 27, and 28

Defendant City of Webster Groves failed to train their staff not to violate civil Rights. But they knew of the legal action pending against defendant Flanery and total disregards plaintiff Civil Rights.

Due Process must Come into play, see exhibit 30 and 31. Defendant's act of Conspiracy shows a total disregard of Plaintiff's Civil Rights.

Also a clear showing to violate plaintiff's First Amendment Rights.

As stated in Harlow vs. Fitzgerald 102 S. Ct. 2727. Government officials performing discretionary functions generally are shielded from liability for civil damages insofar as their conduct does not violate clearly established statutory or constitutional rights of which reasonable person would not have known.

V. Relief: State briefly and exactly what you want the Court to do for you.

Award Monetary Damages

VI. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES [☒]

NO [☐]

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

Whatever the Court Deem just

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES [☒]

NO [☐]

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 28 day of June, 20 06

George P. Pade
Signature of Plaintiff(s)